

Via ECF

August 30, 2021

The Honorable Robert W. Lehrburger
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, New York 10007

Re: *Williams v. KuCoin, et al.*, No. 20-cv-02806 (GBD) (RWL)

Dear Judge Lehrburger:

We write on behalf of Plaintiff, and consistent with your Honor's Order (ECF No. 66), to further update the Court on the status of discovery and, in particular, developments since Plaintiff's previous updates filed with the Court on January 4, 2021 (ECF No. 84), March 5, 2021 (ECF No. 88), May 3, 2021 (ECF No. 99), and July 2, 2021 (ECF No. 101).

I. International Letters of Request

As Plaintiff stated in his previous updates to the Court (ECF Nos. 88, 99, 101), Plaintiff's revised Letter of Request to Defendant KuCoin (authorized by the Court on February 25, 2021, ECF No. 86) was sent by Plaintiff's counsel to the Registrar of the Supreme Court of Singapore on March 3, 2021. If Plaintiff is ultimately unable to obtain discovery from KuCoin in Singapore, Plaintiff intends to use alternative methods, including publicly accessible blockchain ledger information, to obtain relevant information regarding class membership and damages. Plaintiff will provide further detail on such alternative methods in his upcoming September 30, 2021 submission to this court. *See* ECF No. 109.

II. FRCP 45 Subpoenas

As Plaintiff stated in his previous update to the Court, counsel for Plaintiff and TRON reached agreement on terms pursuant to which TRON produced documents in response to Plaintiff's subpoena. TRON made its production to Plaintiff on May 6, 2021. TRON made an additional production of documents to Plaintiff on July 14, 2021.

III. Extension of Discovery Period

Plaintiff will move today for an extension of the August 31, 2021 discovery deadline in order to accommodate delays caused by issues of foreign law concerning discovery.

Respectfully submitted,

/s/ Kyle W. Roche

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